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Via ECF

Hon. Jennifer L. Rochon
United States District Court
Southern District of New York
500 Pearl Street, Room 1920
New York, New York 10007

Re: *Orient Plus Int'l Ltd., et al. v. Baosheng Media Grp. Holdings Ltd., et al.*, 1:24-cv-00744-JLR

Dear Judge Rochon:

King & Wood Mallesons LLP represents Defendants Wenxiu Zhong, Sheng Gong, Yu Zhong, Zuohao Hu, Adam (Xin) He, Yue Jin, and Yanjun Hu (collectively, the “**Individual Defendants**”) in the above-referenced matter. The Individual Defendants submit this letter in response to Plaintiffs’, Orient Plus International Limited, Union Hi-Tech Development Limited, and Golden Genius International Limited (collectively, “**Plaintiffs**”), Motion for Leave to Amend the Second Amended Complaint (the “**Motion**”). See ECF Nos. 118-120. The Individual Defendants respectfully request that the Court exercise its discretion to dismiss with prejudice the Section 12 claim against Defendant Baosheng Media Group Holdings Limited (“**Baosheng**”) and the Section 15 claim against the Individual Defendants.

For the sake of brevity and the Court’s convenience, where applicable, the Individual Defendants adopt the facts and arguments in Baosheng’s July 30, 2024 letter response to Plaintiffs’ Motion (ECF No. 123).

Accordingly, the Individual Defendants respectfully request that the Court grant an order dismissing the Section 12 claim against Baosheng with prejudice and the Section 15 claim against the Individual Defendants with prejudice.

Thank you for your consideration.

Date: July 30, 2024
New York, NY

Respectfully submitted,



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/s/ M.M. Utterback
Andrew Sklar
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